

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

NO. 4:04-CR-090-A

v.

TERRY ANDREW NELSON

**MOTION FOR DETENTION**

The United States moves for pretrial detention of defendant, pursuant to 18 U.S.C. §3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

☐ Crime of violence (18 U.S.C. §3156);

☐ Maximum sentence life imprisonment or death

☐ 10 + year drug offense

☐ Felony, with two prior convictions in above categories

☐ Serious risk defendant will flee

☐ Serious risk obstruction of justice

☒ Felony involving a minor victim

☐ Felony involving a firearm, destructive device, or any other  
dangerous weapon

☐ Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no

conditions of release which will reasonably assure (check one or both):

☐ Defendant's appearance as required

☒ Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant because :

☐ Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. §924(c)

☐ Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. §2332b(g)(5)

☐ Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§1201, 2251

☐ Previous conviction for "eligible" offense committed while on pretrial bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

☐ At first appearance

☒ After continuance of 3 days (not more than 3).

DATED this 14th day of May, 2014.

Respectfully submitted,

SARAH R. SALDAÑA  
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on counsel for the defendant in accordance with the Federal Rules of Criminal Procedure on this 14<sup>th</sup> day of May, 2014.

s/Christopher Stokes  
Christopher Stokes  
Assistant United States Attorney